

DEPARTMENT OF THE ARMY
Portland District, Corps of Engineers
P. O. Box 2946
Portland, Oregon 97208-2946

CENPP-PE
Regulation
No. 200-1-2

31 January 1996

Environmental Quality

Environmental (HTRW) Restoration Management and Coordination

History. This issue publishes a new regulation.

Summary. This regulation covers procedures for environmental restoration related to Hazardous, Toxic and Radioactive Wastes.

1. **PURPOSE.** To provide the policy and guidance necessary for management and coordination of the various District environmental restoration activities related to Hazardous, Toxic and Radioactive Wastes (HTRW). The regulation implements the centralized oversight, decentralized execution approach for management of all HTRW activities accomplished in the District related to environmental restoration.

2. **APPLICABILITY.** All Portland District (NPP) organizational elements.

3. **RELATED REFERENCES.**

a. Portland District Permanent Order Number 2-1, **Management and Execution of the District's HTRW Program**, dated 01 June 1993.

b. Portland District Decision Paper, **Hazardous and Toxic Waste (HTW) Management Organizational Improvements**, dated 26 Apr 1995.

c. ER 1165-2-132, **Hazardous, Toxic and Radioactive Waste (HTRW) Guidance for Civil Works Projects**, dated 26 June 1992.

d. CEMP-RT Memorandum, **Technical Roles and Responsibilities for the USACE Hazardous, Toxic and Radioactive Waste (HTRW) Program**, dated 29 March 1994.

4. OBJECTIVES. The objectives of this Portland District Environmental (HTRW) Restoration Management and Coordination Regulation are to (1) assure a common understanding exists throughout the District of the specific roles and responsibilities for all the organizations involved in HTRW activities, (2) outline the specific responsibilities of the District HTRW Coordinator, (3) assure there is technical and management accountability for all HTRW activities occurring in the District and (4) support the efficient execution of all HTRW activities.

5. EXPLANATION OF TERMS.

a. District HTRW Coordinator. The District HTRW Coordinator is responsible and accountable for facilitation and coordination of the District HTRW Program. Decisions made on HTRW issues within the District will be reported to the HTRW Oversight Group for concurrence and will be reported directly to the District Commander for information purposes.

b. District HTRW Oversight Group. A group composed of the following individuals:

District HTRW Coordinator
Chief, Operations, Construction and Readiness Division (CENPP-CO)
Chief, Planning and Engineering Division (CENPP-PE)
Chief, Real Estate Division (CENPP-RE)
Advisors: Deputy District Commander, Office of Counsel and the Safety Office
(CENPP-DE-D, CENPP-OC and CENPP-SO)

c. HTRW Oversight Group Sub-Group. A team of senior level technical specialists selected to represent the various organizational elements involved in an HTRW activity in a review forum. The District HTRW coordinator will coordinate each members participation with the various resource managers to assure their availability. This team will be responsible for reviewing the planned site specific action protocols and achieving inter-divisional approval of the District resources necessary to accomplish a specific activity. Members of this group may include individuals such as the District HTRW Coordinator, Project Technical Manager, the District ECC, the Project ECC, the Operating Project Managers, Project and Study Managers with HTRW activities and other appropriate technical experts as required.

d. HTRW. As defined in ER 1165-2-132, HTRW includes any material listed as a “hazardous substance” under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 (CERCLA). Hazardous substances under CERCLA include: “hazardous wastes” under Section 3001 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6921; “hazardous substances” identified under Section 311 of the Clean Air Act (CAA), 33 U.S.C. 1321; “toxic pollutants” designated under Section 307 of the Clean Water Act (CWA), 33 U.S.C 1317; “hazardous air pollutants” designated under Section 112 of the Clean Air Act (CAA), 42 U.S.C. 1712; and “imminently hazardous chemical substances or mixtures” on which EPA has taken action under Section 7 of the Toxic Substance Control Act (TSCA), 15 U.S.C. 2606; and petroleum or natural gas problems included in the above categories (See 42 U.S.C. 9601 (14)).

e. District HTRW Program. The District HTRW Program is defined as all work efforts or activities accomplished by all offices within the Portland District to comply with the regulations defined in 5.d.

f. District Environmental Compliance Coordinator (DECC). A position established in the Portland District by NPDR 1130-2-8, Operational Environmental Compliance Program, dated 13 June 1993. The District ECC is appointed by the District Commander to administer the Operation's elements internal environmental compliance program and to coordinate with other functional elements with environmental compliance responsibilities. The District ECC works with the Project ECC to assist the Operating Project Managers in meeting their environmental compliance obligations.

g. Operating Project Manager (OPM). The Operating Project Manager is responsible for all activities which occur during the day to day operations on a specific project. The aforementioned responsibility includes all compliance requirements including HTRW for activities accomplished on the project lands and in the project facilities.

h. Project Environmental Compliance Coordinator (PECC). Environmental Compliance Coordinator positions established at the various NPP operating projects to advise the OPM on compliance with environmental programs. The Project ECC coordinates with the District ECC to achieve a common standard of compliance.

i. District Environmental Response Team (DERT). In-house teams of District employees, trained and experienced in HTRW work activities who may be used to assess the extent of problems identified through ERGO assessments and perform small clean-up activities to correct compliance problems on the District's operational project facilities. Missions for a DERT Team could be site assessments, site characterizations and, if required, environmental cleanups. Typically, contract resources will be used for laboratory analysis, transportation and disposal of waste, technical assistance and emergency spill response. The composition of these teams made up of members from the Operations, Construction and Readiness Division and Planning and Engineering Division will vary with the activity being accomplished.

6. RESPONSIBILITIES.

a. The District HTRW coordinator will be responsible for the following activities:

- 1) Commanders Point of Contact (POC) for all District HTRW issues.
- 2) Primary District POC with State and Federal regulatory agencies on all District HTRW issues.
- 3) District resource and principal advisor to technical personnel on guidance, regulations, etc., pertaining to the management of HTRW activities.
- 4) Provides management oversight of all HTRW activities accomplished by the Technical Divisions, including the HTRW component of ERGO, construction grants, superfund, Real Estate (RE) actions, DERP, Support for Others (SFO), etc.
- 5) Reviews and consults in all proposed contract actions pertaining to HTRW activities including A/E contracts, remediation contracts, purchase orders for waste disposals, etc.
- 6) Maintains an inventory and current status of all District HTRW activities.
- 7) Assures the timely and substantive compliance with all notices of non-compliance and violations.
- 8) Maintains a database of current manpower staffing, capabilities and training related to HTRW activities. This element involves evaluating and assessing the overall District HTRW capabilities.

- 9) Responsible for interfacing with and resolving work allocation issues with the HTRW Design District and the MCX.
- 10) Conducts HTRW process audits and improvement initiatives.
- 11) For other than an emergency response, chairs the oversight sub-group meeting for the purpose of review and decision on approach to pursue to accomplish all site characterization and remedial action type activities and procedures in the District.
- 12) If requested, provides input to the performance evaluations of the supervisors of team members participating in HTRW activities.
- 13) Chairs the District HTRW Oversight Group meetings. Plans, schedules and facilitates the meetings. Solicits and prepares agenda topics for monthly meetings.
- 14) Facilitates the assignment of work to District HTRW resources. Works through the various chains of command, if work requires input across organizational boundaries.

b. The District HTRW Oversight Group provides policy guidance, sets priorities, resolves disputes and shares information related to the various HTRW activities occurring in the District. The group also provides inter-organizational concurrence on all proposed actions or activities related to HTRW. The District HTRW Oversight Group will not be involved in day-to-day decision making on operational issues.

c. The Operating Project Managers (OPMs) are the designated facility managers for the projects to which they are assigned. The OPMs are responsible for assuring that all regulatory requirements are met for all activities, including HTRW activities, associated with the operation of their project. In some cases, the OPMs are personally liable for the HTRW compliance activities on their project. All coordination and execution actions shall account for this OPM responsibility.

d. The District Environmental Compliance Coordinator (ECC) is responsible for coordinating new information and assuring the District's operating projects comply with the requirements of 12 major environmental compliance programs specified in NPDR 1130-2-8, Operational Environmental Compliance Program, dated 13 June 1993. These programs include:

- 1) Air Emissions Management
- 2) Cultural and Historic Resources Management
- 3) Hazardous Materials Management
- 4) Hazardous Waste Management
- 5) Natural Resources Management
- 6) Pesticide Management
- 7) Petroleum, Oil and Lubricants Management
- 8) Solid Waste Management
- 9) Special Pollutants Management (Asbestos, Radon, PCBs and Noise)
- 10) Underground Storage Tank (UST) Management
- 11) Wastewater Management (Storm water runoff, Sanitary Wastewater discharges, Facility NPDES)
- 12) Water Quality Management (Public water supplies, well heads and aquifers)

The District ECC is also responsible for assuring environmental compliance assessments are completed that address all the programs listed above, assuring periodic reviews of our current operations are accomplished and corrective actions implemented if deficiencies are identified. In addition, the ECC develops the required hazard communication documents, prepares spill planning and emergency response guidelines for the operating projects and the floating plant and oversees the blood borne pathogen program. The District ECC also assures standardization exists between all the projects and the compliance programs for which they are subject.

e. The Project Environmental Compliance Coordinators will assure compliance is maintained at the project and monitor progress on the implementation of corrective actions to resolve areas of non-compliance findings identified through either ERGO assessments or other site studies of the current and past practices of the project operations.

7. PROCEDURES.

a. The District HTRW Coordinator will chair a monthly meeting of the District HTRW Oversight Group. Agenda items will be submitted to committee members one week in advance of the scheduled meeting date. In order to assure that the HTRW Coordinator stays informed of all HTRW issues within the District, all written correspondence with regulatory agencies related to HTRW activities will be routed through the District HTRW Coordinator prior to release outside the District. The coordinator will establish an inventory of on-going HTRW projects within the District which includes the name of the responsible managers (both technical and project). The list will be reviewed monthly with the responsible managers for accuracy of information prior to the Oversight Group meeting.

b. The District HTRW Oversight Group will meet monthly for informational updates on all HTRW Activities occurring within the District.

c. All District outside communication, whether incoming or outgoing, related to HTRW activities will be coordinated with the HTRW Coordinator, promptly.

d. All District HTRW cleanup plans will be reviewed by a technical sub-group to the HTRW Oversight Group made up of representatives of CENPP-EN and CENPP-CO for assurance of the methods proposed and designation of the lead for the cleanup activity. The Safety Office will be responsible for review of the safety and health portion of the work plan associated with the job being reviewed by the technical sub-group. The Safety Office will also assure an industrial hygienist has reviewed the safety and health section of the plan.

e. The District Environmental Compliance Coordinator will be responsible for management of the execution of the District's ERGO program. The District ECC will inform the District HTRW Coordinator of all activities related to HTRW compliance occurring at all projects within the District. The District ECC's primary POC at the projects will be the Project ECC.

f. The Project Environmental Compliance Coordinators are the primary POCs for compliance activities and corrective actions required at the projects. All HTRW activities occurring at the projects will be reported to the District ECC, who in-turn will report the status of such projects to the District HTRW Coordinator. Coordination between the District ECC and the District HTRW Coordinator will be done at least monthly.

g. The District Environmental Response Team (DERT) which has been developed to accomplish minor in-house cleanups at the various projects following discoveries of contamination or spills will be maintained in a trained and ready status. Any activation of the team will be coordinated between the District HTRW Coordinator and the District ECC.

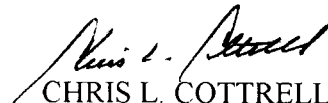
8. ROLES AND RESPONSIBILITIES. The roles and responsibilities matrix published in the paper cited in Section 3.b. provides the basis for the coordination, management and execution of the various work efforts related to HTRW in the Portland District.
9. FUNDING. Funding for the HTRW Coordinator to accomplish the inter-District coordination and management activities, not directly related to any specific project shall be supplied by each of the major technical Divisions at the beginning of each fiscal year. The total apportionment by Division Offices shall be as follows:

Operations, Construction and Readiness Division	50%
Planning and Engineering Division	35%
Real Estate Division	10%
Programs and Project Management Division	5%

The above apportionment's shall cover 25% of the total of : 30% of the Coordinator's fully burdened labor costs and 80% of the Coordinator's Assistant fully burdened labor cost. Each of the above Divisions are responsible for supplying the HTRW Coordinator with an account number(s) with sufficient funds to cover the above apportionment's at the beginning of each fiscal year. The percentages listed above and the funding amounts which they represent will be reviewed by the HTRW Coordinator on a quarterly basis for accuracy and any changes required will be submitted to the HTRW Oversight Group for approval.

FOR THE COMMANDER:

2 Appendices
 App A - HTRW Organization
 App B - District Roles and
 Responsibilities Matrix


 CHRIS L. COTTRELL
 Major, EN
 Deputy Commander

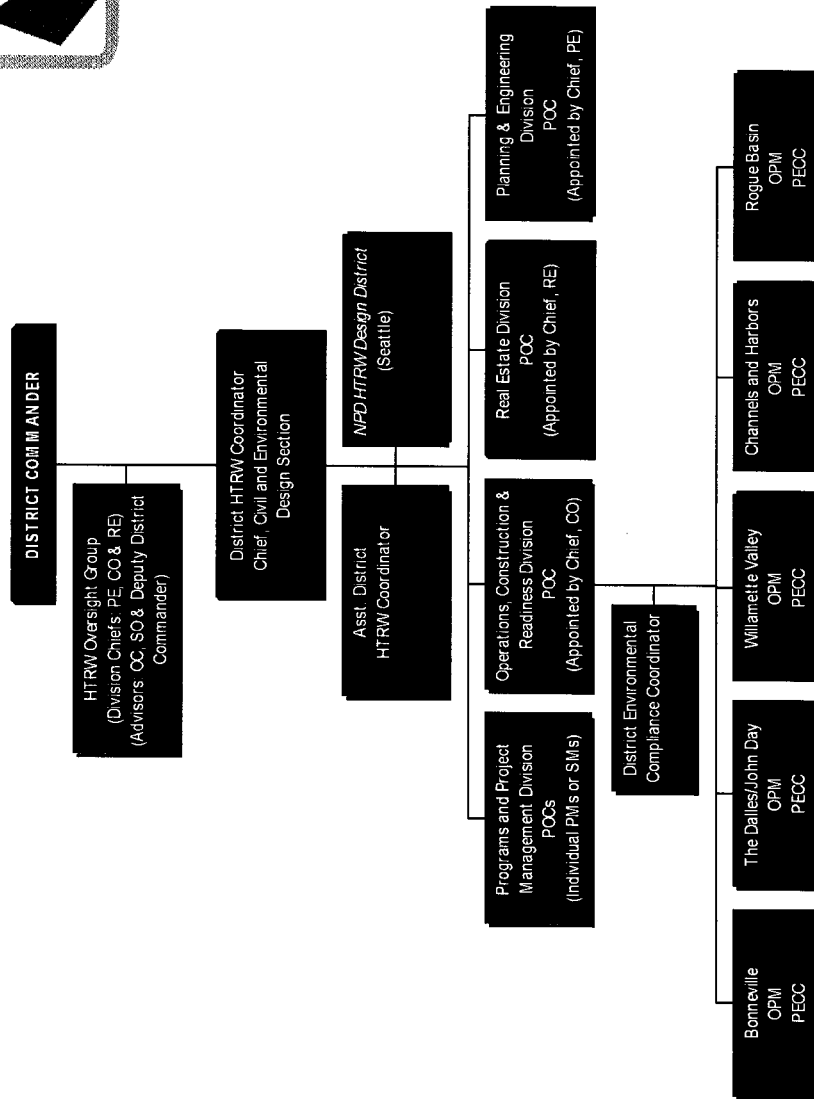
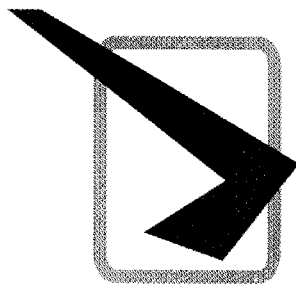
DISTRIBUTION:
 All Supervisors

APPENDIX A

HTRW ORGANIZATION

Management and Coordination Structure

(Centralized Oversight/Decentralized Execution)



APPENDIX B

**Roles and Responsibilities of District Elements
for HTW Project Submittals and Related Activities**

Major District HTW Activities					Roles and Responsibilities by District Element											
Civil Works Projects	District Coordination (Internal/External)	CERCLA Activity	RCRA Activities	UST Removals	ECC	HTWC	HTW Committee	CO	OC	OP	PA	PE	PM	RE	SO	LS
	Internal															
	Within District HQ Office					E	I		C							
	External															
	With Operating Projects				E	I				C						
	With MSC					E/C	I			C						
	With MSC HTRW Design District					E	I									
	With MCX					E	I									
	With HQUSACE					E	I		C							
	With State (for O & M Projects)				C	E	I		C/A	A	I					
	With EPA (for O & M Projects)				C	E	I		C/A	A	I					
	With State					M/E	I		C/A		I	C				
	With EPA					M/E	I		C/A		I	C				
	Reconnaissance															
	Review existing information					R	I		C			E	M			
	Prepare limited SSHP					R						E	M		R	
	Initial study area visit					I						E	M			
	Visit potential project areas					I						E	M			
	Evaluation & Report Input					R	I		R		I	E	M	I		
	Develop feasibility SOW					R						E	M			
	Land Acquisition Study					I						C		E		

Roles and Responsibilities of District Elements for HTW Project Submittals and Related Activities

Major District HTW Activities					Roles and Responsibilities by District Element												
Civil Works Projects	District Coordination (Internal/External)	CERCLA Activity	RCRA Activities	UST Removals	ECC	HTWC	HTW Committee	CO	OC	OP	PA	PE	PM	RE	SO	LS	
Feasibility Studies																	
SSHP						R						E	M		R		
Data Collection						I						E	M				
Investigate contamination and assess threat						I						E	M				
Develop prelim HTW response alternatives						I						E	M				
Project plan selection						R						E	M				
Preliminary HTW Response to Recommended Plan						R			C			E	M				
Prepare HTW Appendix						R						E	M				
Land Acquisition Study						I						C		E			
Planning Engineering & Design																	
Evaluate as in Feasibility and report in DM. Sponsor to develop response to include SSHP in DM & PS						R		R	I	R		R	C			E	
Construction																	
SSHP						I		C		I		E			R	R	
Gather data/evaluate risks & extent of contamination						I		M	C	I		E					
Recommend Plan						I	I	C	R	C		E					
Execute Plan						I	I	E		I		C					
HDR (HTW Documentation Report)						I	I	R		R		E		R			

Roles and Responsibilities of District Elements for HTW Project Submittals and Related Activities

Major District HTW Activities					Roles and Responsibilities by District Element												
Civil Works Projects	District Coordination (Internal/External)	CERCLA Activity	RCRA Activities	UST Removals	ECC	HTWC	HTW Committee	CO	OC	OP	PA	PE	PM	RE	SO	LS	
Operation, Maintenance, Repair, Replacement and Rehabilitation																	
Suspected Discovery (Major Problems)																	
Notification of District					I	I				E							
Initial Assessment					M	R	I		I			E					
Funding										E							
Site Characterization Plan					M	R	I	R	C	R		E					
Work Plan					M	R		R		R		E					
Execute SSHP					C	C		C				E			R		
Delineate Contamination & Assess Threat					C	R	I	C				E					
Develop Response Alternatives					R	R	I	C	R	R		E					
Select Response Plan					R	I	I	C	R	R		E					
Design Response Plan					C	I	I	C		C		E					
Implement Response Plan					R	I		E				R					
Document Response					R	I		E	R			R					
Monitor (as required)					R	I				E		R					
ERGO Compliance Assessments																	
at Projects					E	I				M/R		C			R		
on Out granted Properties and out granted disposals:					E	I				R		C		M	R		
Corrective Action Plans					E	I				I							
Corrective Action Plan Execution					I	I				M/C		E					

Roles and Responsibilities of District Elements for HTW Project Submittals and Related Activities

Major District HTW Activities					Roles and Responsibilities by District Element												
Civil Works Projects	District Coordination (Internal/External)	CERCLA Activity	RCRA Activities	UST Removals	ECC	HTWC	HTW Committee	CO	OC	OP	PA	PE	PM	RE	SO	LS	
		Preliminary Assessments															
		Scope of Work			I	I				M		E					
		Work Plan			I	I				C		E			R		
		Report			R	R	I		C/R	R		E					
		Transmit to EPA			I	E	I			I		I					
		Site Inspections															
		Scope of Work			R	I				A		E					
		Work Plan			R	I				R		E			R		
		Investigations			R	I		C		C	C	E					
		Report			R	R	I		C/R	A		E					
		Remedial Investigations															
		Scope of Work			C	I	I	C	C	A		E			C		
		Work Plan			R	I				A		E					
		Lab Validation								I		E					
		Community Relations			C					C	E	C					
		Sampling and Analysis Plan										E					
		Site Safety and Health Plan			C	I				I		E			R		
		Data Quality Report			C	I				R		E					
		QC Summary Report			C	I				R		E					
		Chemical Quality Assurance Report			C	I	I			R		E					
			Corrective Measures (Listed Site)														
			SOW		E	R		R	C	M		R					

Roles and Responsibilities of District Elements for HTW Project Submittals and Related Activities

Major District HTW Activities					Roles and Responsibilities by District Element												
Civil Works Projects	District Coordination (Internal/External)	CERCLA Activity	RCRA Activities	UST Removals	ECC	HTWC	HTW Committee	CO	OC	OP	PA	PE	PM	RE	SO	LS	
			Work Plan		R	I	I	R		E		R			R		
			Contract Lab Validation									E					
			Sampling & Analysis Plan		R			R				E					
			Community Relations			C				C	E						
			SSHP		R			R		E		R			R		
			Daily QC Reports		R			R		E		R					
			QC Summary Report		R			R		E		R					
			CQA Report		R			R		E		R					
			Field Investigation Report		R	I	I	R				E					
			Interim Measures		R	I	I			M/E		R					
			Work Plan & Report		R	I				M/E		R					
				UST RD/RA													
			SOW		R	I		R	C	M/A		E			C		
			Work Plan		R	I	I	R		A		E					
			Contract Lab Validation		I	I		I		I		E					
			S & A Plan		R			R		R		E					
			CQA Report		R			E				R					
			S & H Plan		R			R				E			R		
			Concept Design			R						E					
			Pre final Design		R	R		R		R	I	E					
			Design Instructions to Field		R	R		R		R		E					
			As-Advertised Plans & Specs		R	R	I	R		R		E					
			Plan of Operations		R	I	I	E		I		R/C					